

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: MMA LAW FIRM, PLLC Debtor.	§ § § § §	Case No. 24-31596
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**NOTICE OF AMENDED PROPOSED ORDER
FOR 9019 SETTLEMENT THAT RESOLVES RELEVANT OBJECTIONS**

The Debtor, the UCC,¹ and EAJF² respectfully submit the attached Amended Proposed Order and Amended Exhibit D in support of their 9019 motion to compromise.³ As the Court will recall, the 9019 motion was heard on April 28–29. In the hearing, the Court took evidence establishing the Debtor’s business judgment. The Court also heard limited objections from defendants in adversary proceedings brought by the Debtor—largely reserving their rights against any argument that the settlement made any sort of liability finding. After the 9019 hearing ended, the UCC engaged with the primary objectors Allied World Insurance Company and Cristobal M. Galindo, PC d/b/a Galindo Law to address their objections.

The result of that process are the attached Amended Proposed Order and Amended Exhibit D, which has been signed and approved by the Debtor, EAJF, and the UCC. Allied World and Galindo—through their bankruptcy counsel—have also approved the terms in the attached. And counsel for Krause & Kinsman Trial Lawyers, LLC; Broussard Injury Lawyers, LLC; Daly &

¹ The “UCC” refers to The Official Committee of Unsecured Creditors for the bankruptcy estate of MMA Law Firm, PLLC.

² The label “EAJF” refers to Equal Access Justice Fund, LP and EAJF ESQ Fund, LP, who claim to be secured prepetition lenders.

³ See ECF No. 588 (Debtor’s Motion to Compromise Controversy with Equal Access Justice Fund, LP and EAJF Fund, LP).

Black, P.C.; Hair & Shunnarah Trial Attorneys, LLC; and Laborde Earles, Law Firm, LLC—all parties who previously filed limited objections—have confirmed that they’re also unopposed to the Amended Proposed Order and Amended Exhibit D.

The only ones opposed to the Amended Proposed Order and Amended Exhibit D are Morris Bart, L.L.C. and Voorhies Law Firm, LLC. Neither have explained what terms they’re opposed to exactly. Nor have they proposed any language that would assuage their concerns. Given their arguments at the 9019 hearing, it’s hard to fathom how the Amended Proposed Order and Amended Exhibit D don’t address all their objections. In any event, Morris Bart and Voorhies made their positions known at the 9019 hearing, so they’ve had an opportunity to be heard.

The Amended Proposed Order and Amended Exhibit D attached to this notice address the parties’ objections. And the Debtor has satisfied the elements under Federal Rule of Bankruptcy Procedure 9019. It is time to clear the logjam between the Debtor, EAJF, and the UCC, so this bankruptcy case can move toward a confirmable plan. For these reasons, the Debtor, EAJF, and the UCC respectfully ask that the Court sign and enter the Amended Proposed Order and Amended Exhibit D as soon as possible.

Dated: May 12, 2025

Respectfully submitted,

LAWSON & MOSHENBERG PLLC

By: /s/ Avi Moshenberg

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above was electronically mailed to the parties that are registered to receive electronic notices *via* CM/ECF in this case on May 12, 2025.

/s/ Avi Mosehnberg
Avi Moshenberg